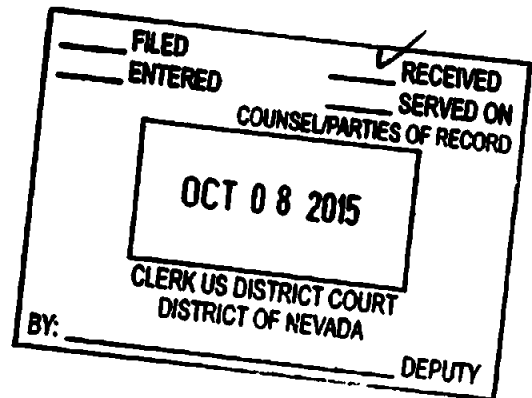


Maryanne Diggs
Name
1295 Grand Summit Drive
Apt L381 Reno, NV 89523
775 316 5954
Prison Number



**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Maryanne Diggs
Plaintiff,

vs.

Bloch, Inc and, Leo's
Dance wear and,
John Evans

Defendant(s).

CASE NO. 3:15-cv-00510
(T)

**CIVIL RIGHTS COMPLAINT
PURSUANT TO
42 U.S.C. § 1983**

A. JURISDICTION

1) This complaint alleges that the civil rights of Plaintiff, Maryanne Diggs
(Print Plaintiff's name)

who presently resides at 1295 Grand Summit Drive Apt L381, were

violated by the actions of the below named individuals which were directed against

Plaintiff at Bloch, Inc and Leo's Dance wear John Evans on the following dates
(institution/city where violation occurred)

Harassment, Age/race discrimination, and Malicious Conduct
(Count I) (Count II) (Count III)

**Make a copy of this page to provide the below
information if you are naming more than five (5) defendants**

2) Defendant Bloch Inc. & Leos Darcwear resides at 1170 Trademark Dr, Suite 112
(full name of first defendant) (address if first defendant)
and is employed as Company. This defendant is sued in his/her
(defendant's position and title, if any)
☒ individual ☐ official capacity. (Check one or both). Explain how this defendant was
acting

under color of law: _____

3) Defendant John Evans resides at 1170 Trademark Dr Suite 112
(full name of first defendant) (address if first defendant)
and is employed as Supervisor. This defendant is sued in his/her
(defendant's position and title, if any)
☒ individual ☐ official capacity. (Check one or both). Explain how this defendant was
acting

under color of law: _____

4) Defendant _____ resides at _____,
(full name of first defendant) (address if first defendant)
and is employed as _____. This defendant is sued in his/her
(defendant's position and title, if any)
☐ individual ☐ official capacity. (Check one or both). Explain how this defendant was
acting

under color of law: _____

5) Defendant _____ resides at _____,
(full name of first defendant) (address if first defendant)
and is employed as _____. This defendant is sued in his/her
(defendant's position and title, if any)
☐ individual ☐ official capacity. (Check one or both). Explain how this defendant was
acting

under color of law: _____

6) Defendant _____ resides at _____,
(full name of first defendant) (address if first defendant)
and is employed as _____. This defendant is sued in his/her
(defendant's position and title, if any)
____ individual ____ official capacity. (Check one or both). Explain how this defendant was
acting
under color of law: _____

7) Jurisdiction is invoked pursuant to 28 U.S.C. § 1343 (a)(3) and 42 U.S.C. § 1983. If you wish
to assert jurisdiction under different or additional statutes, list them below.

.....

B. NATURE OF THE CASE

1) Briefly state the background of your case.

was hired through temp agency
and hired on as permanent employee
demoted and refused Health Benefits
In addition, retaliated against due
to age, race, and disability.

.....

C. CAUSE OF ACTION

COUNT I

The following civil rights has been violated: Harrassment

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

Mr. Evans continued to make a hostile verbally abusive and, intimidating work environment for me. This pervasive and persistent conduct interfered with my work performance

COUNT II

The following civil rights has been violated: Age discrimination
and racial discrimination

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

Mr. Evans prejudicial attitude towards my age caused injury and harm. The treatment I received from Mr. Evans affected the terms and conditions of my work environment. He made intentional and unwanted treatment less favorable than other co-workers.

COUNT III

The following civil rights has been violated: Malicious Conduct

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

Mr Evans use of derogatory and intentional racial slurs were unwelcome. Mr. Evans conduct and hostile behavior against me was extremely intimidating, hostile, offensive and created a very hostile environment. I was isolated and retaliated against due to Mr. Evans abusing his supervisors power.

D. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

- 1) Have you filed other actions in state or federal courts involving the same or similar facts as involved in this action? ___ Yes ☒ No. If your answer is "Yes", describe each lawsuit. (If more than one, describe the others on an additional page following the below

outline).

- a) Defendants: _____
- b) Name of court and docket number: _____
- c) Disposition (for example, was the case dismissed , appealed or is it still pending?):

- d) Issues raised: _____

- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

- 2) Have you filed an action in federal court that was **dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted?**
___ Yes ☒ No. If your answer is "Yes", describe each lawsuit. (If you had more than three actions dismissed based on the above reasons, describe the others on an additional page following the below outline.)

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: _____
- b) Name of court and case number: _____
- c) The case was dismissed because it was found to be (check one): ___ frivolous
___ malicious or ___ failed to state a claim upon which relief could be granted.
- d) Issues raised: _____

- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: _____
- b) Name of court and case number: _____

- c) The case was dismissed because it was found to be (check one): _____ frivolous
_____ malicious or _____ failed to state a claim upon which relief could be granted.
- d) Issues raised: _____

- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: _____
- b) Name of court and case number: _____
- c) The case was dismissed because it was found to be (check one): _____ frivolous
_____ malicious or _____ failed to state a claim upon which relief could be granted.
- d) Issues raised: _____

- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

- 3) Have you attempted to resolve the dispute stated in this action by seeking relief from the proper administrative officials, e.g., have you exhausted available administrative grievance procedures? ☒ Yes ☐ No. If your answer is "No", did you not attempt administrative relief because the dispute involved the validity of a: (1) _____ disciplinary hearing; (2) _____ state or federal court decision; (3) _____ state or federal law or regulation; (4) _____ parole board decision; or (5) _____ other EEOC.

If your answer is "Yes", provide the following information. Grievance Number 24B-2014-
Date and institution where grievance was filed 5-21-14 00561.

Response to grievance: "Right to Sue letter"

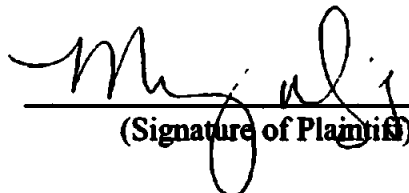
E. REQUEST FOR RELIEF

I believe that I am entitled to the following relief:

Compensation of Health Benefits
Pain and sufferings and, loss
wages

I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

(Name of Person who prepared or helped
prepare this complaint if not Plaintiff)


(Signature of Plaintiff)

10-8-15
(Date)

(Additional space if needed; identify what is being continued)